

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNI-SCREW EUROPE BV,

Plaintiff,

v.

**UNISCREW WORLDWIDE, INC. and
STEWART TIPPING,**

Defendants.

No. 07 CV 7033 (PKC)(AJP)

**DECLARATION IN SUPPORT OF
REQUEST FOR ENTRY OF DEFAULT**

Sarah C. Hsia, Esq., being duly sworn, deposes and states:

1. I am an attorney admitted to practice in the United States District Court for the Southern District of New York, and am an Associate with the law firm of Alston & Bird LLP. I am the attorney of record for Plaintiff Uni-Screw Europe BV, and I submit this declaration in support of Plaintiff's Request for Entry of Default. The facts contained in this Declaration are based upon my personal knowledge
2. Uni-Screw Europe BV filed a Summons and Complaint in this action on August 6, 2007.
3. Defendant UniScrew Worldwide, Inc. was personally served with a copy of the Summons and Complaint on August 9, 2007, pursuant to CPLR § 311. *See* Docket Entries 1, 5, true and accurate copies of which are attached hereto as Exhibit A.
4. Defendant UniScrew Worldwide, Inc. has failed to answer or otherwise respond to the Complaint, and more than twenty (20) days have elapsed since the date on which Defendant UniScrew Worldwide, Inc. was served with the Summons and Complaint.

5. Accordingly, the time within which Defendant UniScrew Worldwide, Inc. may answer or otherwise move with respect to the Complaint has expired, and Defendant UniScrew Worldwide, Inc. has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.

6. Defendant UniScrew Worldwide, Inc. is a corporation organized under the laws of Tennessee, and is thus not an infant or incompetent, and is not presently in the military service of the United States.

7. Plaintiff Uni-Screw Europe BV thus respectfully requests that the default of Defendant UniScrew Worldwide, Inc. be noted by the Clerk of the Court.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: New York, New York
September 14, 2007

/s/ Sarah C. Hsia
Sarah C. Hsia (SH-1030)
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